

Received & Inspected

Annual 47 C.F.R. 64.2009(e) CPNI Certification

MAR 4 - 2008

EB DOCKET 06-36

FCC Mail Room

Annual 64.2009 (e) CPNI Certification for 2007

Date filed: February 29, 2008

Name of Company: Talk America, Inc.

Form 499 Filer ID: 822848

Name of Signatory: Edward B. Meyercord, III

Title of Signatory: Chief Executive Officer

I, Edward B. Meyercord, III, certify that I am an officer of the company named above and that I have personal knowledge of the operating procedures of the company as they relate to the Rules and Regulations of the Federal Communications Commission regarding CPNI. To the best of my knowledge, information and belief, the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 of the Commission's rules.

The company has not taken any actions against data brokers in the past year, and has had no indication pretexters are attempting to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



No. of Copies rec'd 044
List ABCDE

Accompanying Statement on Compliance With CPNI Requirements

Sections 64.2100 through 64.2900 of the Commission's Rules

Talk America, Inc. (Company), including its affiliates Network Telephone Corporation and LDMI which are operating under a consolidated 499 Filer ID with Talk America, has implemented internal procedures to ensure compliance with the Commission's Customer Proprietary Network Information (CPNI) requirements.

The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 C.F.R. 64.2005. If the company elects to use CPNI for purposes in a manner that requires customer approval, it will follow the applicable rules set forth in section 64.2007, including the institution of operational procedures to ensure that notification is provided, customer approval is obtained, and records are maintained for a minimum of one year.

The Company does not use CPNI to identify or track customers that call competing providers.

The Company maintains electronic records of its own and affiliates' sales and marketing campaigns that use CPNI of its customers, including a description of the marketing campaign and the products and services offered as part of the campaign. These records are maintained for at least one year. While the Company does not currently disclose or provide CPNI to any third parties for marketing purposes, should it do so in the future, it will utilize similar procedures to maintain records of such disclosure.

The Company does not disclose call detail information over the telephone, based on a customer-initiated contact. Call detail information is only mailed to the customer's address of record. If the customer is able to provide call detail information to the service representative during a customer-initiated call without the representative's assistance, the service representative will discuss the call detail information provided by the customer.

The Company authenticates on-line access to CPNI and back-up authentication in the event of lost or forgotten password does not prompt the customer for readily available biographical information or account information.

The Company notifies customers of account changes (including change in password, customer response to a back-up means of authentication for lost or forgotten passwords, online account changes, or creation of or changes to the address of record) in accordance with Section 64.2010(f).

The Company has instituted training procedures to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. All new employees with access to CPNI are trained as part of their orientation. Existing

employees are trained when CPNI rules or internal procedures are changed. The training includes details on how to record and report any instance in which CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. After completion of training, employees confirm in writing that they have received training and understand the CPNI policy.

The Company has procedures in place to record and maintain records of any improper disclosure of CPNI.

A disciplinary process, up to and including dismissal, is in place for any employee violating the CPNI regulations and policies.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided.

The Company has established processes in accordance with section 64.2011 for timely notification to law enforcement and the United States Secret Service and FBI of any CPNI security breaches, and has procedures in place for appropriate records retention.